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Via FedEx/Filed on Pacer

January 15, 2020

The Honorable George B. Daniels  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 1000

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, No. 03-MDL-1570 (GBD) (SN)  
*Gordon Aamoth Sr. et al. v. Islamic Republic of Iran*, No. 1:18-cv-12276 (GBD) (SN)  
*Lloyd A. Abel Sr. et al. v. Islamic Republic of Iran*, No. 1:18-cv-11837 (GBD) (SN)  
*Audrey Ades et al. v. Islamic Republic of Iran*, No. 1:18-cv-07306 (GBD) (SN)  
*Roberto Agyeman et al. v. Islamic Republic of Iran*, No. 1:18-cv-5320 (GBD) (SN)  
*Jessica DeRubbio et al. v. Islamic Republic of Iran*, No. 1:18-cv-05306 (GBD) (SN)  
*Marinella Hemenway et al. v. Islamic Republic of Iran*, No. 1:18-cv-12277 (GBD) (SN)  
*Alexander Jimenez et al. v. Islamic Republic of Iran*, No. 1:18-cv-11875 (GBD) (SN)  
*Bakahityar Kamardinova et al. v. Islamic Republic of Iran*, No. 1:18-cv-05339 (GBD) (SN)  
*Chang Don Kim et al. v. Islamic Republic of Iran*, No. 1:18-cv-11870 (GBD) (SN)  
*Maureen Moody-Theinert et al. v. Islamic Republic of Iran*, No. 1:18-cv-11876 (GBD) (SN)  
*Horace Morris et al. v. Islamic Republic of Iran*, No. 1:18-cv-05321 (GBD) (SN)  
*Cheryl Rivelli et al. v. Islamic Republic of Iran*, No. 1:18-cv-11878 (GBD) (SN)  
*Matthew Rowenhorst et al. v. Islamic Republic of Iran*, No. 1:18-cv-12387 (GBD) (SN)

Dear Judges Daniels and Netburn:

Enclosed please find courtesy copies for chambers of Notices of Amendment which have been electronically filed as of record with the clerk in the following twelve (12)<sup>1</sup> *O'Neill-Iran* matters, as well as on the master docket in compliance with the procedural orders in this M.D.L. and the individual rules of practice:

1. *Gordon Aamoth Sr. et al. v. Islamic Republic of Iran*, No. 1:18-cv-12276 (GBD) (SN), M.D.L. E.C.F. No. 5490 (1/10/20).
2. *Lloyd A. Abel Sr. et al. v. Islamic Republic of Iran*, No. 1:18-cv-11837 (GBD) (SN), M.D.L. E.C.F. No. 5493 (1/10/20).

<sup>1</sup> We recently filed an additional Notice of Amendment in connection with a motion for damages pertaining to two (2) additional plaintiffs for whom we sought a judicial determination of them being functional equivalents in *Cheryl Rivelli et al. v. Islamic Republic of Iran*, No. 1:18-cv-11878 (GBD) (SN). A courtesy copy of both the Notice of Amendment and the Motion for a Partial Judgment was sent to chambers separately.

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3. *Audrey Ades et al. v. Islamic Republic of Iran*, No. 1:18-cv-07306 (GBD) (SN), M.D.L. E.C.F. No. 5495 (1/10/20).
4. *Jessica DeRubbio et al. v. Islamic Republic of Iran*, No. 1:18-cv-05306 (GBD) (SN), M.D.L. E.C.F. No. 5496 (1/10/20).
5. *Marinella Hemenway et al. v. Islamic Republic of Iran*, No. 1:18-cv-12277 (GBD) (SN), M.D.L. E.C.F. No. 5500 (1/10/20).
6. *Alexander Jimenez et al. v. Islamic Republic of Iran*, No. 1:18-cv-11875 (GBD) (SN), M.D.L. E.C.F. No. 5494 (1/10/20).
7. *Bakahityar Kamardinova et al. v. Islamic Republic of Iran*, No. 1:18-cv-05339 (GBD) (SN), M.D.L. E.C.F. No. 5508 (1/13/20).
8. *Chang Don Kim et al. v. Islamic Republic of Iran*, No. 1:18-cv-11870 (GBD) (SN), M.D.L. E.C.F. No. 5509 (1/13/20).
9. *Maureen Moody-Theinert et al. v. Islamic Republic of Iran*, No. 1:18-cv-11876 (GBD) (SN), M.D.L. E.C.F. No. 5497 (1/10/20).
10. *Horace Morris et al. v. Islamic Republic of Iran*, No. 1:18-cv-05321 (GBD) (SN), M.D.L. E.C.F. No. 5507 (1/13/20).
11. *Cheryl Rivelli et al. v. Islamic Republic of Iran*, No. 1:18-cv-11878 (GBD) (SN), M.D.L. E.C.F. No. 5492 (1/10/20).
12. *Matthew Rowenhorst et al. v. Islamic Republic of Iran*, No. 1:18-cv-12387 (GBD) (SN), M.D.L. E.C.F. No. 5510 (1/13/20).

Further, please find courtesy copies for chambers of Motions for Substitution along with proposed orders which have been electronically filed as of record with the clerk in the following ten (10) *O'Neill-Iran* matters, as well as on the master docket in compliance with the procedural orders in this M.D.L. and the individual rules of practice:

1. *Gordon Aamoth Sr. et al. v. Islamic Republic of Iran*, No. 1:18-cv-12276 (GBD) (SN), M.D.L. E.C.F. Nos. 5518-19 (1/14/20).
2. *Roberto Agyeman et al. v. Islamic Republic of Iran*, No. 1-18-cv-5320(GBD) (SN), M.D.L. E.C.F. Nos. 5526-27 (1/14/20).
3. *Jessica DeRubbio et al. v. Islamic Republic of Iran*, No. 1:18-cv-05306 (GBD) (SN), M.D.L. E.C.F. Nos. 5520-21 (1/14/20).
4. *Marinella Hemenway et al. v. Islamic Republic of Iran*, No. 1:18-cv-12277 (GBD) (SN), M.D.L. E.C.F. Nos. 5548-49 (1/14/20).
5. *Alexander Jimenez et al. v. Islamic Republic of Iran*, No. 1:18-cv-11875 (GBD) (SN), M.D.L. E.C.F. Nos. 5522-23 (1/14/20).

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6. *Bakahityar Kamardinova et al. v. Islamic Republic of Iran*, No. 1:18-cv-05339 (GBD) (SN), M.D.L. E.C.F. Nos. 5530-31 (1/14/20).
7. *Chang Don Kim et al. v. Islamic Republic of Iran*, No. 1:18-cv-11870 (GBD) (SN), M.D.L. E.C.F. Nos. 5532-33 (1/14/20).
8. *Horace Morris et al. v. Islamic Republic of Iran*, No. 1:18-cv-05321 (GBD) (SN), M.D.L. E.C.F. Nos. 5534, 5536 (1/14/20).
9. *Cheryl Rivelli et al. v. Islamic Republic of Iran*, No. 1:18-cv-11878 (GBD) (SN), M.D.L. E.C.F. Nos. 5538, 5540 (1/14/20).
10. *Matthew Rowenhorst et al. v. Islamic Republic of Iran*, No. 1:18-cv-12387 (GBD) (SN), M.D.L. E.C.F. Nos. 5543, 5545 (1/4/20).

We are presently electronically filing motions seeking solatium awards for individual family members, compensatory damages for pain and suffering with regard to certain of the estates, and economic damages for certain of the estates in fifteen (15) of the *O'Neill* Iran matters. The declarations filed in connection with those applications, as well as the accompanying memoranda of law, will further discuss these Notices of Amendment and Notices of Substitution. After filing, courtesy copies will promptly be delivered to chambers.

Respectfully submitted,

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*Attorney for the Plaintiffs*

Enc. a/s  
cc: All counsel of record—MDL